

Law Offices of Franklin S. Montero, LLC

451 Clifton Avenue
Clifton, New Jersey 07011**

515 Madison Avenue, 6th Floor
New York, NY 10022

Member of NJ and NY Bars

Phone: 973-777-8718
Fax: 973-777-1710
E-mail: Montero@FMonterolaw.com
Fsmonterolaw.com

*** Mail Reply to Clifton Office*

May 6, 2022

VIA ECF-PACER

Hon. Chief Magistrate Margo K. Brodie, U.S.M.J.
U.S. District Court, Eastern District of NY
225 Cadman Plaza East
Brooklyn, NY 11201

**RE: Dominguez et al v. Hernandez et al
Civil Action No. 1:21-cv-07051-MKB-VMS**

Dear Hon. Chief Magistrate,

My office represents the Plaintiff(s), Jamie Dominguez and JDD Entertainment Inc. in the above referenced matter. We submit this letter pursuant to your Honor's Order dated 01/19/2022 directing the Joint Case Management Plan to be submitted by 04/26/2022. Our office served all Defendant(s) in the above-entitled action with a copy of the Scheduling Order for the Initial conference on 05/10/2022, the Joint CMP, and the full docket by U.S. Regular and Certified Mail. Our office filed a Certificate of Service on 03/22/2022 (*See Attachment*). As of the date of this letter, we have not received any communication on part of any of the Defendant(s). Thank you for all the effort and time you have spent on this matter. If there are any questions or concerns, please feel free to contact my office.

Respectfully submitted,



FRANKLIN S. MONTERO, ESQ.

Encls.

FRANKLIN S. MONTERO, ESQ. - EDNY No. FM-2557
THE LAW OFFICES OF FRANKLIN S. MONTERO, LLC
451 Clifton Avenue
Clifton, NJ 07011
Tel: (973) 777-8718
Fax: (973) 777-1710
Email: montero@fmonterolaw.com
Attorney(s) for the Plaintiffs

**UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF NEW YORK**

JAIME DOMINGUEZ; JJD
ENTERTAINMENT, INC.,

Plaintiff(s),

vs.

DANIEL HERNANDEZ, a/k/a TEKASHI
69; Will Cornish; 6IX9INE TOURING INC.;
1ST CALL MGMT.; MURDA MGMT, LLC,

Defendant(s).

Civil Action

CERTIFICATE OF SERVICE

Case No. 1:21-cv-07051-MKB-VMS

I, Franklin S. Montero, Esq. of full age; certifies to the following:

1. I represent the Plaintiffs, Jamie Dominguez and JDD Entertainment Inc., in the above-named matter. I am an attorney at law of the State of New York and as such, I make this Certification based upon personal knowledge.
2. On January 19, 2022, I mailed a copy of the Scheduling Order for the Initial Conference on 05/10/2022, Joint Proposed CMP, and full docket by U.S. Regular Mail and U.S. Certified Mail to the Defendant(s) below. Please see attached Correspondence, Certified Mail Receipt and U.S. Regular Mail Receipt (*Exhibit A*) for the following:
 - a. **Murda Management LLC**
Tracking No. 9407 1116 9900 0578 7957 14
 - b. **Will Cornish**
Tracking No. 9407 1116 9900 0578 7794 24
 - c. **Daniel Hernandez**
Tracking No. 9407 1116 9900 0578 7710 91
 - d. **6IX9INE Touring Inc.**

Tracking No. 9407 1116 9900 0578 7785 71

e. **1st Call Entertainment, LLC**

Tracking No. 9407 1116 9900 0578 7983 26

I certify that the foregoing statements made by me are true and correct. I am aware that if any of the foregoing statements made by me are knowingly false, I am subject to punishment.

Date: January 19, 2022



Franklin S. Montero, Esq.

Exhibit A

Case No. 1:21-cv-07051-MKB-VMS

Law Offices of Franklin S. Montero, LLC

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January 19, 2022

VIA U.S. Regular and U.S. Certified Mail

Murda Management, LLC
4611 N. Federal Hwy, Apt. 139
Pompano Beach, FL 33064

**Re: Dominguez et al v. Hernandez et al
Docket Case No. 1:21-cv-07051-MKB-VMS**

Dear Sir/Madam:

This office represents the Plaintiffs, Jamie Dominguez and JDD Entertainment Inc. in reference to the above U.S. District, Eastern District of New York matter. A Telephonic Initial Conference is scheduled for 5/10/2022 at 11:00 AM before Magistrate Judge Vera M. Scanlon. The parties are to call 877-336-1829 and type in the access code 3581283 for the AT&T conference bridge. Persons granted remote access to proceedings are reminded of the general prohibition against photographing, recording, and rebroadcasting of court proceedings. The parties must complete the attached Joint Proposed Case Management Plan (CMP) and file it on ECF no later than 4/26/2022. Please find attached the full docket and CMP. Feel free to contact my office, should you have any questions.

U.S. Postal Service Certified Mail Receipt

ARTICLE NUMBER: 9407 1116 9900 0678 7957 14

ARTICLE ADDRESSED TO:

Murda Management, LLC
4611 N. Federal Hwy, Apt. 139
Pompano Beach FL 33064-6664

FEES

Postage Per Piece	\$0.53
Certified Fee	3.75
Total Postage & Fees:	4.28

Postmark
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Regards,



Franklin S. Montero, Esq.



Receipt

Print Date: Jan 19, 2022

RETURN TO

Franklin S. Montero
451 Clifton Avenue
Clifton, NJ 07011

SHIP TO

Murda Management
4611 N. Federal Hwy, Apt. 139
Pompano Beach, FL 07011 US

REFERENCE

Ship Date: Jan 19, 2022
Ship from ZIP: 07011
Weight: 0 lbs. 1 oz.
User: fmontero
Cost Code: <None>
Refund Type: E-refund
Reference #:
Printed on: Shipping label
Tracking #: 00040699000562025968

SERVICE

UNIT PRICE

First Class ® Envelope	\$0.53
Tracking	\$0.00
Insurance (N/A)	
Subtotal	\$0.53
Label Quantity	1
Total Cost	\$0.53

USPS Tracking®

[FAQs >](#)[Track Another Package +](#)**Tracking Number:** 9407111699000578795714[Remove X](#)

Your item has been delivered to the original sender at 12:21 pm on April 19, 2022 in CLIFTON, NJ 07011.

USPS Tracking Plus® Available  **Delivered, To Original Sender**

April 19, 2022 at 12:21 pm
CLIFTON, NJ 07011

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Fsmonterolaw.com

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January 19, 2022

VIA U.S. Regular and U.S. Certified Mail

Will Cornish
15 Henry Street
Bristol, CT 06010

**Re: Dominguez et al v. Hernandez et al
Docket Case No. 1:21-cv-07051-MKB-VMS**

Dear Mr. Cornish:

This office represents the Plaintiffs, Jamie Dominguez and JDD Entertainment Inc. in reference to the above U.S. District, Eastern District of New York matter. A Telephonic Initial Conference is scheduled for 5/10/2022 at 11:00 AM before Magistrate Judge Vera M. Scanlon. The parties are to call 877-336-1829 and type in the access code 3581283 for the AT&T conference bridge. Persons granted remote access to proceedings are reminded of the general prohibition against photographing, recording, and rebroadcasting of court proceedings. The parties must complete the attached Joint Proposed Case Management Plan (CMP) and file it on ECF no later than 4/26/2022. Please find attached the full docket and CMP. Feel free to contact my office, should you have any questions.

U.S. Postal Service Certified Mail Receipt

ARTICLE NUMBER: 9407 1118 9900 0578 7794 24

ARTICLE ADDRESSED TO:

Will Cornish
15 Henry Street
Bristol CT 06010-6336

FEES

Postage Per Piece	\$0.53
Certified Fee	3.75
Total Postage & Fees:	4.28

Postmark
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Regards,



Franklin S. Montero, Esq.



Receipt

Print Date: Jan 19, 2022

RETURN TO

Franklin S. Montero
451 Clifton Avenue
Clifton, NJ 07011

SHIP TO

Will Cornish
15 Henry Street
Bristol, CT 07011 US

REFERENCE

Ship Date: Jan 19, 2022
Ship from ZIP: 07011
Weight: 0 lbs. 1 oz.
User: fmontero
Cost Code: <None>
Refund Type: E-refund
Reference #:
Printed on: Shipping label
Tracking #: 00040699000562025100

SERVICE

UNIT PRICE

First Class ® Envelope	\$0.53
Tracking	\$0.00
Insurance (N/A)	

Subtotal	\$0.53
Label Quantity	1
Total Cost	\$0.53

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January 22, 2022 at 12:28 pm
BRISTOL, CT 06010

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January 19, 2022

VIA U.S. Regular and U.S. Certified Mail

Daniel Hernandez
3000 Marcus Ave
Suite 1W5
Lake Success, NY 11042

**Re: Dominguez et al v. Hernandez et al
Docket Case No. 1:21-cv-07051-MKB-VMS**

Dear Mr. Hernandez:

This office represents the Plaintiffs, Jamie Dominguez and JDD Entertainment Inc. in reference to the above U.S. District, Eastern District of New York matter. A Telephonic Initial Conference is scheduled for 5/10/2022 at 11:00 AM before Magistrate Judge Vera M. Scanlon. The parties are to call 877-336-1829 and type in the access code 3581283 for the AT&T conference bridge. Persons granted remote access to proceedings are reminded of the general prohibition against photographing, recording, and rebroadcasting of court proceedings. The parties must complete the attached Joint Proposed Case Management Plan (CMP) and file it on ECF no later than 4/26/2022. Please find attached the full docket and CMP. Feel free to contact my office, should you have any questions.

U.S. Postal Service Certified Mail Receipt

ARTICLE NUMBER: 9407 1116 9900 0578 7710 91

ARTICLE ADDRESSED TO:

Daniel Hernandez
3000 Marcus Ave Suite 1W5
New Hyde Park NY 11042-1007

FEES

Postage Per Piece
Certified Fee
Total Postage & Fees:

\$0.53
3.75
4.28

Postmark
Here

Regards,



Franklin S. Montero, Esq.



Receipt

Print Date: Jan 19, 2022

RETURN TO

Franklin S. Montero
451 Clifton Avenue
Clifton, NJ 07011

SHIP TO

Daniel Hernandez
3000 Marcus Ave Suite 1W5
New Hyde Park, NY 07011 US

REFERENCE

Ship Date: Jan 19, 2022
Ship from ZIP: 07011
Weight: 0 lbs. 1 oz.
User: fmontero
Cost Code: <None>
Refund Type: E-refund
Reference #:
Printed on: Shipping label
Tracking #: 00040699000562025957

SERVICE

UNIT PRICE

First Class ® Envelope	\$0.53
Tracking	\$0.00
Insurance (N/A)	
Subtotal	\$0.53
Label Quantity	1
Total Cost	\$0.53

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Tracking Number: 9407111699000578771091

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Your item was delivered to an individual at the address at 11:52 am on January 24, 2022 in NEW HYDE PARK, NY 11042.

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 **Delivered, Left with Individual**

January 24, 2022 at 11:52 am
NEW HYDE PARK, NY 11042

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Fsmonterolaw.com

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*** Mail Reply to Clifton Office*

January 19, 2022

VIA U.S. Regular and U.S. Certified Mail

6IX9INE Touring Inc.
3000 Marcus Ave, Suite 1W5
Lake Success, NY 11042

**Re: Dominguez et al v. Hernandez et al
Docket Case No. 1:21-cv-07051-MKB-VMS**

Dear Sir/Madam:

This office represents the Plaintiffs, Jamie Dominguez and JDD Entertainment Inc. in reference to the above U.S. District, Eastern District of New York matter. A Telephonic Initial Conference is scheduled for 5/10/2022 at 11:00 AM before Magistrate Judge Vera M. Scanlon. The parties are to call 877-336-1829 and type in the access code 3581283 for the AT&T conference bridge. Persons granted remote access to proceedings are reminded of the general prohibition against photographing, recording, and rebroadcasting of court proceedings. The parties must complete the attached Joint Proposed Case Management Plan (CMP) and file it on ECF no later than 4/26/2022. Please find attached the full docket and CMP. Feel free to contact my office, should you have any questions.

U.S. Postal Service Certified Mail Receipt

ARTICLE NUMBER: 9407 1116 9900 0976 7785 71

ARTICLE ADDRESSED TO:

6IX9INE Touring Inc.
3000 Marcus Ave, Suite 1W5
New Hyde Park NY 11042-1007

FEES

Postage Per Piece	\$0.53
Certified Fee	3.75
Total Postage & Fees:	4.28

Postmark
Here

Regards,



Franklin S. Montero, Esq.



Receipt

Print Date: Jan 19, 2022

RETURN TO

Franklin S. Montero
451 Clifton Avenue
Clifton, NJ 07011

SHIP TO

6IX9INE Touring Inc.
3000 Marcus Ave, Suite 1W5
New Hyde Park, NY 07011 US

REFERENCE

Ship Date: Jan 19, 2022
Ship from ZIP: 07011
Weight: 0 lbs. 1 oz.
User: fmontero
Cost Code: <None>
Refund Type: E-refund
Reference #:
Printed on: Shipping label
Tracking #: 00040699000562027526

SERVICE

First Class ® Envelope
Tracking
Insurance (N/A)

UNIT PRICE

\$0.53
\$0.00

Subtotal \$0.53
Label Quantity 1
Total Cost \$0.53

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Your item was delivered to an individual at the address at 11:24 am on January 31, 2022 in NEW HYDE PARK, NY 11042.

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January 31, 2022 at 11:24 am
NEW HYDE PARK, NY 11042

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Fsmonterolaw.com

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*** Mail Reply to Clifton Office*

January 19, 2022

VIA U.S. Regular and U.S. Certified Mail

1st Call Entertainment, LLC
15 Henry Street
Bristol, CT 06010

**Re: Dominguez et al v. Hernandez et al
Docket Case No. 1:21-cv-07051-MKB-VMS**

Dear Sir/Madam:

This office represents the Plaintiffs, Jamie Dominguez and JDD Entertainment Inc. in reference to the above U.S. District, Eastern District of New York matter. A Telephonic Initial Conference is scheduled for 5/10/2022 at 11:00 AM before Magistrate Judge Vera M. Scanlon. The parties are to call 877-336-1829 and type in the access code 3581283 for the AT&T conference bridge. Persons granted remote access to proceedings are reminded of the general prohibition against photographing, recording, and rebroadcasting of court proceedings. The parties must complete the attached Joint Proposed Case Management Plan (CMP) and file it on ECF no later than 4/26/2022. Please find attached the full docket and CMP. Feel free to contact my office, should you have any questions.

U.S. Postal Service Certified Mail Receipt

ARTICLE NUMBER: 9407 1116 9900 0578 7983 26

ARTICLE ADDRESSED TO:

1st Call Entertainment, LLC
15 Henry Street
Bristol CT 06010-6336

FEES

Postage Per Piece	\$0.53
Certified Fee	3.75
Total Postage & Fees:	4.28

Postmark
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Regards,



Franklin S. Montero, Esq.



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Print Date: Jan 19, 2022

RETURN TO

Franklin S. Montero
451 Clifton Avenue
Clifton, NJ 07011

SHIP TO

1st Call Entertainment
15 Henry Street
Bristol, CT 07011 US

REFERENCE

Ship Date: Jan 19, 2022
Ship from ZIP: 07011
Weight: 0 lbs. 1 oz.
User: fmontero
Cost Code: <None>
Refund Type: E-refund
Reference #:
Printed on: Shipping label
Tracking #: 00040699000562025086

SERVICE

UNIT PRICE

First Class ® Envelope	\$0.53
Tracking	\$0.00
Insurance (N/A)	

Subtotal	\$0.53
Label Quantity	1
Total Cost	\$0.53

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Your item was delivered to an individual at the address at 12:28 pm on January 22, 2022 in BRISTOL, CT 06010.

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January 22, 2022 at 12:28 pm
BRISTOL, CT 06010

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**U.S. District Court
Eastern District of New York (Brooklyn)
CIVIL DOCKET FOR CASE #: 1:21-cv-07051-MKB-VMS**

Dominguez et al v. Hernandez et al
Assigned to: Chief Judge Margo K. Brodie
Referred to: Magistrate Judge Vera M. Scanlon
Cause: 28:1332 Diversity-Contract Dispute

Date Filed: 12/21/2021
Jury Demand: None
Nature of Suit: 190 Contract: Other
Jurisdiction: Diversity

Plaintiff**Jamie Dominguez**

represented by **Franklin Santiago Montero**
Law Offices of Franklin S. Montero, LLC
451 Clifton Avenue
07011
Clifton, NJ 07011
973-777-8718
Fax: 973-777-1710
Email: montero@fmonterolaw.com
ATTORNEY TO BE NOTICED

Plaintiff**JDD Entertainment Inc.**

represented by **Franklin Santiago Montero**
(See above for address)
ATTORNEY TO BE NOTICED

V.

Defendant

Daniel Hernandez
also known as
Tekashi 69

Defendant**Will Cornish****Defendant****6IX9INE Touring Inc.****Defendant****1st Call Entertainment LLC****Defendant****Murda Management, LLC**

Date Filed	#	Docket Text
12/21/2021	<u>1</u>	COMPLAINT against All Defendants filing fee \$ 402, receipt number CNYEDC-15137100 Was the Disclosure Statement on Civil Cover Sheet completed -yes,, filed by Jamie

		Dominguez, JDD Entertainment Inc.. (Attachments: # <u>1</u> Civil Cover Sheet, # <u>2</u> Proposed Summons) (Montero, Franklin) (Entered: 12/21/2021)
12/21/2021		Case Assigned to Chief Judge Margo K. Brodie and Magistrate Judge Vera M. Scanlon. Please download and review the Individual Practices of the assigned Judges, located on our website. Attorneys are responsible for providing courtesy copies to judges where their Individual Practices require such. (Bowens, Priscilla) (Entered: 12/22/2021)
12/22/2021	<u>2</u>	Summons Issued as to All Defendants. (Bowens, Priscilla) (Entered: 12/22/2021)
12/22/2021	<u>3</u>	In accordance with Rule 73 of the Federal Rules of Civil Procedure and Local Rule 73.1, the parties are notified that <i>if</i> all parties consent a United States magistrate judge of this court is available to conduct all proceedings in this civil action including a (jury or nonjury) trial and to order the entry of a final judgment. Attached to the Notice is a blank copy of the consent form that should be filled out, signed and filed electronically <i>only if all</i> parties wish to consent. The form may also be accessed at the following link: http://www.uscourts.gov/uscourts/FormsAndFees/Forms/AO085.pdf . You may withhold your consent without adverse substantive consequences. Do NOT return or file the consent <u>unless</u> all parties have signed the consent. (Bowens, Priscilla) (Entered: 12/22/2021)
12/22/2021	<u>4</u>	This attorney case opening filing has been checked for quality control. See the attachment for corrections that were made, if any. (Bowens, Priscilla) (Entered: 12/22/2021)
01/19/2022	<u>5</u>	SCHEDULING ORDER: A Telephonic Initial Conference is scheduled for 5/10/2022 at 11:00 AM before Magistrate Judge Vera M. Scanlon. The parties are to call 877-336-1829 and type in the access code 3581283 for the AT&T conference bridge. Persons granted remote access to proceedings are reminded of the general prohibition against photographing, recording, and rebroadcasting of court proceedings. The parties must complete the attached Joint Proposed Case Management Plan (CMP) and file it on ECF no later than 4/26/2022. In addition to appearing parties' submission of the CMP as directed herein, in the event that any Defendant(s) has not answered or otherwise appeared, Plaintiff(s) must also mail a copy of this Order, its attachment and the full docket to the last known mailing address(es) for such Defendant(s) and file proof on ECF by the CMP filing date. Ordered by Magistrate Judge Vera M. Scanlon on 1/19/2022. (Quinlan, Krista) (Entered: 01/19/2022)

PACER Service Center			
Transaction Receipt			
01/19/2022 15:37:09			
PACER Login:	Fmontero	Client Code:	
Description:	Docket Report	Search Criteria:	1:21-cv-07051-MKB-VMS
Billable Pages:	2	Cost:	0.20

UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF NEW YORK

----- X

Plaintiff(s),

**JOINT PROPOSED
CIVIL CASE MANAGEMENT PLAN**

-against-

Civ. () (VMS)

Defendant(s).

----- X

The parties/counsel who conferred in drafting this joint proposed case management plan:

For Plaintiff(s):

For Defendant(s):

- A. Do the parties request referral to the Court's ADR program? Yes: ☐ No: ☐
- B. Do the parties consent to proceed before a Magistrate Judge pursuant to 28 U.S.C. § 636(c)?
Yes: ☐ If yes, fill out the AO 85 Notice, Consent and Reference of a Civil Action to a Magistrate Judge Form and file it on ECF. <https://www.uscourts.gov/forms/civil-forms/notice-consent-and-reference-civil-action-magistrate-judge>.
No: ☐ If no, do not indicate which party declines consent.
- C. The parties may wish to engage in settlement discussions.
If so, Plaintiff(s) will serve demand by . Defendant(s) will respond by .
- D. Defendant(s) will answer or otherwise respond to complaint by , if not yet done.
The parties will serve Rule 26(a)(1) initial disclosures by , if not yet done.
The parties will serve initial document requests and interrogatories on or before .
Any joinder and/or amendments of the pleadings must be made by .
The parties will complete fact discovery by .
If the parties perform expert discovery, they will serve initial disclosures by ;
initial expert reports by ; and rebuttal expert reports on or before .
All discovery, including expert depositions, will be completed by , and the parties
will file a joint letter certifying the close of all discovery by this same date.

Other considerations the parties wish to bring to the Court's attention, such as the need for electronic discovery or confidentiality order: